

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN**

EQUAL EMPLOYMENT  
OPPORTUNITY COMMISSION,

Plaintiff,

v.

ALTERNATE SOLUTIONS HEALTH  
NETWORK, LLC, *et al.*

Defendant.

CASE NO. 2:23cv13043

HONORABLE LINDA V.  
PARKER

**PLAINTIFF EQUAL EMPLOYMENT OPPORTUNITY  
COMMISSION’S WITNESS LIST**

Plaintiff Equal Employment Opportunity Commission

(“Commission”) submits the following list of witnesses who may be  
called at trial:

1. Michelle Polec
2. Jacob Schwandt
3. Sheri Polec
4. Thomas Polec
5. Amy Huguenot
6. Amanda McLain

7. Nikki Pinto
8. Diana Ward
9. Gretchen Farrell
10. Joan Van Zant
11. Emily Mowery
12. Kelsey Hall
13. Leigh Powell
14. Jessica Zimmer
15. Madeline Hubbard
16. Elisabeth Sierawski
17. Nichole Profant
18. Emily Cook
19. David Ganzarto
20. Everett Neal
21. Dr. Arnel Clarin
22. Dr. Arion Lochner
23. Dr. Jamal Khattak
24. Any of Michelle Polec's treating health care professionals
25. Records custodian for Alternate Solutions Health Network

26. Records custodian for Beaumont ASHN, LLC
27. Records custodian for any of Michelle Polec's health care providers, including but not limited to Henry Ford Health System.
28. Records custodian for The Michigan Unemployment Insurance Agency (UIA)
29. Any employee(s) of The Michigan Unemployment Agency (UIA) who worked on Michelle Polec's claim or communicated with Defendants regarding the same.
30. Any employees of Defendants who participated in the decision to deny Michelle Polec's request for accommodation
31. Any visiting occupational therapists employed by Defendants (not yet identified by Defendants)
32. Any and all of Michelle Polec's patients (not yet identified by Defendants)
33. All individuals listed on Defendants' Witness Lists
34. Any and all necessary rebuttal expert witnesses
35. Any and all expert witnesses identified by Defendants

The Commission reserves the right to amend this Witness  
List as individuals and facts become known through discovery.

Respectfully submitted,

/s/ Karen L. Brooks  
KAREN L. BROOKS  
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EQUAL EMPLOYMENT  
OPPORTUNITY COMMISSION  
DETROIT FIELD OFFICE  
Patrick V. McNamara Building  
477 Michigan Avenue, Room 865  
Detroit, Michigan 48226

Dated: May 14, 2024

**CERTIFICATE OF SERVICE**

I hereby certify that on May 14, 2024, I electronically filed the foregoing document, *Plaintiff Equal Employment Opportunity Commission's Witness List*, with the Clerk of the Court using the ECF system, which will send notification of such filing to the attorneys of record *via* the Court's e-filing system.

/s/ Karen L. Brooks  
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Commission  
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